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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

CASE NO. 3:25-CV-04849-SI

v.

Coordinated with

Case No. 4:25-CV-04849

FATHI ABDULRAHIM HARARA and
NATIVE GROUNDS, LLC, d/b/a
JERUSALEM COFFEE HOUSE,

Defendants.

**JOINT STIPULATION *AS AMENDED*
BY THE COURT AND
~~[PROPOSED]~~ AMENDMENT TO
CASE MANAGEMENT ORDER**

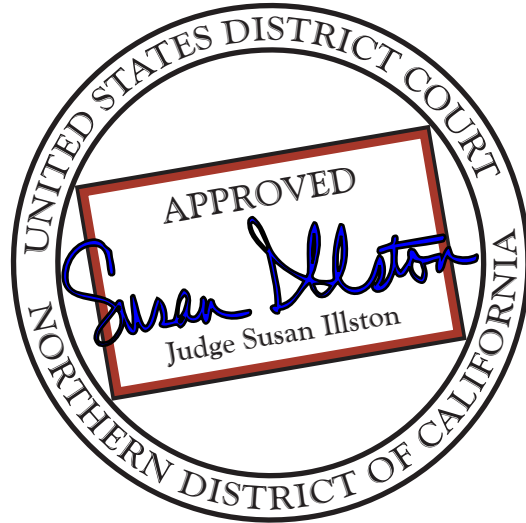
MICHAEL RADICE

Plaintiff,

vs.

JERUSALEM BOXING CLUB, LLC;
NATIVE GROUNDS, INC.; ABDULRAHIM
HARARA; DOES 1–20

Defendants.



Date: December 9, 2025

At midnight on September 30, 2025, the appropriations act that had been funding the Department of Justice expired and appropriations to the Department lapsed. On October 31, 2025, the parties jointly requested a stay of the litigation, *Dkt. 32*, which the Court granted on the same date, *Dkt. 33*. The Court ordered the United States to “promptly notify the Court as soon as the government shutdown has ended and confer with opposing counsel submit within two weeks a revised join proposed schedule, including rescheduling the parties’ case management conference currently scheduled for November 14, 2025.” *Dkt. 33*.

Appropriations were restored on the evening of November 12, 2025, for a total lapse of 43 days. On November 17, 2025, the United States timely notified the Court that appropriations had been restored and that the United States would confer with counsel and file a proposed case management order on or before November 26, 2025.

The United States conferred with Defendants’ counsel as well as counsel for Plaintiff in the related case, *Radice v. Jerusalem Boxing Club, LLC et al.*, Case No. 3:25-cv-02060. Given the time lost due to the lapse in appropriations, the parties have stipulated to the following proposed schedule:

Event	Current Date	Proposed Date
Expert Disclosures	December 15, 2025	January 15, 2026
Expert Rebuttal Disclosures	January 15, 2026	February 16, 2026
Close of Discovery	February 28, 2026	NO CHANGE
Dispositive Motions	March 31, 2026	NO CHANGE

DATED: December 5, 2025

2